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Subject: Nuclear Management Company Comments on Proposed Generic Communications Re: Safety Conscious Work Environment

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November 15, 2004

Mr. Michael T. Lesar
Chief, Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Proposed Generic Communication; Establishing and Maintaining a
Safety Conscious Work Environment (69 Fed Reg. 61049; October 14, 2004)

Nuclear Management Company (NMC), LLC* (NMC) appreciates the opportunity to comment on the proposed guidance to licensees on establishing and maintaining a Safety Conscious Work Environment as discussed in the subject Federal Register Notice published October 14, 2004.

NMC fosters a safety conscious work environment for its employees and as a learning organization welcomes any information which would allow it to further improve in this area. However, the proposed Regulatory Information Summary (RIS) as written provides no new information and offers no analytical basis for its determination of "best practices." NMC shares the concerns expressed by the Nuclear Energy Institute and endorses the comments made by the Nuclear Energy Institute in its letter dated November 15, 2004.

Edward J. Weinkam
Director, Regulatory Services
Nuclear Management Company, LLC

* NMC is the licensed operator of the Duane Arnold Energy Center, Kewaunee Nuclear Power Plant, Monticello Nuclear Generating Plant, Palisades Nuclear Plant, Point Beach Nuclear Plant Units 1 and 2, and Prairie Island Nuclear Generating Plant Units 1 and 2.